EXHIBIT B

Page 1

UNITED STATES DISTRICT COURT

DISTRICT OF NEW YORK

CASE NO. 14-cv-5474 (PGG)

- - -

HANNA BOUVENG,

Plaintiff, :

vs.

NYG CAPITAL LLC d/b/a/ :

NEW YORK GLOBAL GROUP :

GROUP, FNL MEDIA LLC, :

and BENJAMIN WEY, :

Defendants. :

VIDEOTAPED DEPOSITION OF

BENJAMIN WEY

March 10, 2015

New York, New York

- - -

REPORTED BY: DANA N. SREBRENICK, CRR CLR

- - -

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1	Page 38		Page 40
	A. Yes.	1	document that's been marked Exhibit 10, which
2	Q. What was the master's thesis	2	consists of five pages.
3	in?	3	Have you ever seen that before?
4	A. It was in leadership.	4	A. May I see this?
5	Q. Just regular old leadership,	5	Q. So the pending question,
6	not any kind of special leadership?	6	Mr. Wey, in case you forgot, is did you ever
7	A. Leadership about	7	see this document before.
8	entrepreneurship strategies.	8	A. Yes, I have.
9	Q. Was that a daytime program, a	9	Q. And if you look at the last
10	nighttime program, both day and night? You	10	page or the second to last page or, the
11	tell me.	11	third to last page sorry page number 3
12	A. Both day and night.	12	of this exhibit, which is Bates numbered 109,
13	Q. Did you ever work in Oklahoma?	13	that's your signature, true?
14	A. Yes.	14	A. Yes.
15		15	
	Q. What kind of work did you do in	16	, , , , ,
16	Oklahoma?		2 of exhibit of the exhibit, it says,
17	A. International trade and	17	"Censure. Respondent" that's you,
18	investments.	18	correct?
19	Q. Okay. And did who did you	19	A. Yes.
20	work for in Oklahoma?	20	Q "consents to the issuance of
21	A. I worked for myself.	21	a censure," right?
22	Q. Did did you have a company	22	A. Yes.
23	name that you worked for? Did you set up a	23	Q. And prohibition to conduct
24	firm or a company?	24	business, it says, "Respondent" again,
25	A. Yes.	25	that's you, true?
	Page 39		Page 41
1	Q. What was the name?	1	A. Yes.
2	A. It's called New York Global	2	Q "agrees that subsequent to
3	Group. It's Benchmark Global Group.	3	the execution of the agreement, he shall not
4	Q. And at some point, did you get	4	request to register as a broker dealer,
5	in trouble with the Oklahoma Department of	5	broker dealer agent, investment advisor,
6	Securities?	6	investment advisor representative and/or
7	A. Could you repeat the question?	7	issuer agent under the act," right?
8	Q. Sure. At some point, did you	8	A. Yes.
9	get in trouble with the State of Oklahoma	9	Q. So you agreed that you would
10	Department of Securities?	10	not conduct any of those businesses in the
11	A. What does "trouble" mean here	11	State of Oklahoma, true?
12	in this context?	12	MR. SHER: Objection.
13	Q. Well, did they ban you from	13	BY MR. RATNER:
14	ever selling stock in the State of Oklahoma?	14	Q. You may answer.
15	A. The answer is no.	15	MR. SHER: You can answer.
16	Q. Really? Okay.	16	A. "I shall not request to conduct
17	Were you ever censured by the	17	business in Oklahoma," that's the exact
18	Department of Securities in the State of	18	language.
19	Oklahoma?	19	BY MR. RATNER:
20	A. Yes.	20	
21		21	
	(Exhibit 10, State of Oklahoma	22	next sentence then. "Respondent further
2.2	Department of Securities' letter, marked for	23	agrees that he shall not transact security business on behalf of an issuer of securities
22			
23	identification.)		
	BY MR. RATNER: Q. And I'd like to show you the	24 25	or as a broker dealer, broker dealer agent, investment advisor, investment advisor

11 (Pages 38 to 41)

	Page 62		Page 64
1	February 2014, that what Ms. Bouveng wanted	1	application for the H-1B visa?
2	to do was become a United States citizen,	2	A. I believe we did.
3	true?	3	Q. Okay. Let's put this away.
4	A. Yes.	4	Now, Ms. Bouveng thought that
5	Q. Not that she abandoned applying	5	she could become a citizen because her mother
6	for the H-1B visa because she was negligent	6	was an American citizen, true?
7	or because she was careless or anything like	7	A. Yes.
8	that, true?	8	Q. And isn't it also true that Ms.
9	A. Not true.	9	Bouveng applied for an American passport?
10	Q. Okay. Is there anything in	10	A. I believe she did.
11	on Exhibit 13, page 1548, that says, Oh, by	11	Q. Did she ever get the American
12	the way, Hanna negligently didn't fill out	12	passport?
13	the application?	13	A. I don't know.
14	A. No.	14	Q. In order for her to get the
15	Q. Then, next page, Mr. Johnson	15	American passport, she would have needed a
16	writes back to you on February 27th at 11:18	16	passport from her mother to show that her
17	a.m., right?	17	mother was an American citizen, true?
18	A. Appears to be.	18	A. I believe so.
19	Q. Okay. And and he sent a	19	Q. Did you ever see Ms. Bouveng's
20	copy of this to both you and Ms. Bouveng,	20	mother's passport?
21	right?	21	A. No.
22	A. Yes.	22	Q. Were you aware that
23	Q. And it says, "I'm in receipt of	23	Ms. Bouveng's mother's passport was in
24	Mr. Wey's e-mail early this morning stating	24	Ms. Bouveng's apartment in April 2014?
25	that Ms. Bouveng no longer wishes to go	25	A. No.
	Page 63		Page 65
1	forward with the H-1B petition," right?	1	Q. Were you aware that
2	A. Yes.	2	Ms. Bouveng's mother's passport disappeared
3	Q. And did you respond to that, or	3	from the apartment sometime after you were in
4	did Ms. Bouveng respond to that, to your	4	it?
5	knowledge, and say, No, no, no. I want to go	5	A. No.
6	through with the H-1B petition?	6	Q. Okay. Now, by whom are you
7	A. Yes, we did.	7	employed, if anyone?
8	Q. Okay. And where's that?	8	A. Rephrase the question, please.
9	A. We had a call with Mr. Johnson	9	Q. By whom are you employed, if
10	right after that.	10	anyone?
11	Q. When was the call?	11	A. New York Global Group, NYG
12	A. I don't remember the date or	12	Capital.
13	time. We had a call with him. To clarify,	13	Q. Do you have a title with New
14	Mr. Johnson's concern under point 2,	14	York Global Group?
15	"Therefore, in our opinion, it is a big	15	A. Yes.
16	mistake not to pursue the H-1B case as an	16	Q. What's the title?
17	alternative."	17	A. Chief Executive Officer.
18	Q. Was was Ms. Bouveng on the	18	Q. Are you paid a salary by New
19	call with you and Mr. Johnson?	19	York Global Group?
20	A. She initiated the call, yes.	20	A. Yes.
21	Q. So and and it's your	21	Q. What's your salary?
22	testimony that Ms. Bouveng agreed to continue	22	A. 200,000.
	with the H-1B petition; is that true?	23	Q. A day, a week, a year, a month?
23			= *
23 24 25	A. Yes. It was a dual track. Q. So did you and she submit an	24 25	A. Per year. Q. Do you receive any other

	Page 66		Page 68
1	compensation besides your salary from New	1	Q. Who?
2	York Global Group?	2	A. Cleaning people.
3	A. No.	3	Q. Okay. Anyone else?
4	Q. In in the year 2000	4	A. Outside law firms.
5	withdrawn.	5	Q. Anyone else?
6	Have you done your 2014 taxes?	6	A. Business consultants.
7	MR. SHER: I'm going to object	7	Q. In 2014, was Mr. Scholander
8	to this line of questioning. What is the	8	paid any money by New York Global Group?
9	relevance of this line of questioning	9	A. No.
10	because you're not entitled to judgment	10	Q. In 2014, was Mr. Harris paid
11	discovery at this point?	11	any money from New York Global Group?
12	MR. RATNER: Okay.	12	A. No.
13	BY MR. RATNER:	13	Q. Was Messrs either
14	Q. How who else who else is	14	Mr. Scholander or Mr. Harris paid any money
15	employed by New York Global Group?	15	personally from you?
16	A. James Baxter.	16	A. No.
17	Q. What's his position?	17	Q. Do you know what
18	A. Chairman and general counsel.	18	Mr. Scholander's source of income is?
19	Q. Is he paid a salary?	19	A. Don't know.
20	A. No.	20	Q. Or Mr. Harris?
21	Q. Does he receive any	21	A. Don't know.
22	compensation?	22	Q. How many employees does New
23	A. Yes.	23	York Global Group have?
24	Q. How does he get his	24	A. Please clarify the question.
25	compensation? How is that determined?	25	Q. How many employees does New
	Page 67		Page 69
1	A. He's an independent contractor.	1	York Global Group have?
2	Q. He gets a 1099?	2	A. Four.
3	A. Yes.	3	Q. Okay. Did you ever tell anyone
4	Q. How much did he get in his	4	or did New York Global Group ever tell anyone
5	on his 1099 in 2014?	5	that it had 110 full-time employees?
6	A. I don't remember.	6	A. No.
7	Q. Does New York Global Group have	7	MR. RATNER: Okay. Let's mark
8	any other employees?	8	this as Exhibit 15, which is Plaintiff's
9	A. Yes.	9	Bates numbers 1084, 1085, 1086 and 1087.
10	Q. Who?	10	(Exhibit 15, Document Bates
11	A. Melinda Cruz.	11	numbered Plaintiff's 1085 through 1087,
12	Q. What's her title?	12	marked for identification.)
13	A. Office manager.	13	BY MR. RATNER:
14	Q. Anyone else?	14	Q. Do you recognize what this
15	A. Yes.	15	document is?
16	Q. Who else?	16	A. Yes.
17	A. Christy Christy Vaquez.	17	Q. And this is something called a
18	Q. What's her title?	18	Training/Internship Placement Plan, true?
19	A. Receptionist.	19	A. Yes.
20	Q. And anyone else?	20	Q. And it's from the U.S.
21	A. No.	21	Department of State, true?
22	Q. In 2014, besides Mr. Baxter,	22	A. True.
23	were there any other independent contractors	23	Q. United States Department of
24	working for New York Global Group?	24	State, that's a part of the United States
25	A. Yes.	25	government

18 (Pages 66 to 69)

	Page 78		Page 80
1	BY MR. RATNER:	1	says, "Number of employees at training/intern
2	Q. Are you aware if Mr. Baxter or	2	site," and it says the number seven, true?
3	you told anyone that Micheala Wey was the	3	A. Yes.
4	an HR manager at New York Global Group?	4	Q. And it says, "Gross annual
5	MR. SHER: Same objection.	5	revenue over \$25 million," true?
6	A. I don't know.	6	A. True.
7	(Exhibit 16, Document Bates	7	MR. SHER: You're asking if the
8	numbered Defendants' 634 and 635, marked for	8	document if how you read the document is
9	identification.)	9	true or if the information is true?
10	BY MR. RATNER:	10	MR. RATNER: That's a good
11	Q. Okay. I'd like to show you	11	question, Mr. Sher.
12	Exhibit 16, which is Bates numbered	12	BY MR. RATNER:
13	Defendants' 634 and 635.	13	Q. Where where I read the
14	MR. SHER: Where do I find that	14	document accurately, true?
15	in the binder? Is it in order of Bates	15	A. Yes.
16	numbers?	16	Q. But is it true or false that
17	MR. RATNER: No. It was right	17	there are seven employees at the training
18	after the Training/Internship Placement Plan.	18	site?
19	MR. SHER: Okay. Got it.	19	A. I don't remember.
20	MR. RATNER: It should be the	20	Q. Is it true or false that NYGG's
21	next document.	21	gross annual revenue is over \$25 million?
22	THE WITNESS: Got it.	22	A. In the New York location,
23	BY MR. RATNER:	23	false.
24	Q. And if you look at the middle	24	Q. How about in the China
25	on the right-hand side of this document, it	25	location?
	Page 79		Page 81
1	says, "Contact person, full name," and it	1	A. Yes.
2	says under that, "James M. Baxter."	2	Q. Okay. And as a matter of fact,
3	Do you see that?	3	if you look at the second page of this
4	A. Could you point it to me?	4	document, who's Heidi Silverstone?
5	Q. Yeah. It's on the first page.	5	A. She's the representative of
6	A. Oh, yeah, I do.	6	ASSE Aspire
7	Q. Okay.	7	Q. Okay.
8	A. Thank you.	8	A a visa sponsor firm.
9	Q. Then it says, "Title, executive	9	Q. And she got the information
10	chairman." Do you see that?	10	do you know where she got the information
11	A. Yes.	11	that she used to fill out this particular
12	Q. And then it says, "HR manager	12	document?
13	(full name)." And HR manager is human	13	A. Don't know.
14	resources; would that be fair to say?	14	Q. Did she make a visit to New
15	A. Yes.	15	York Global Group's headquarters?
16	Q. And it says, "James M.	16	A. Yes.
17	Baxter" "Baxter" and "Micheala Wey," true?	17	Q. And when she made her visit to
18	A. Could you repeat the question?	18	the headquarters, did you talk to her?
19	Q. Yeah. It says under, "HR	19	A. No.
20	manager (full name)," it lists two people	20	Q. Did Mr. Baxter talk to her?
21	A. Yes.	21	A. I don't know.
22	Q "James M. Baxter" and	22	Q. Did Micheala Wey talk to her?
23	"Micheala Wey," true?	23	A. No.
		0.4	Q. And and Ms. Silverstone
24 25	A. Yes.Q. And on the line under that, it	24 25	Q. And and Ms. Silverstone certified, did she not, if you look at the

21 (Pages 78 to 81)

	Page 158		Page 160
1	MR. RATNER: 001 through it's	1	A. Yes.
2	the LCOR Bates number 009.	2	Q. That's what it says?
3	MR. SHER: It ends at 009?	3	A. Yes.
4	MR. RATNER: Yeah. The exhibit	4	Q. Was that true or false?
5	I'm showing him is only pages 1 through 9.	5	A. Absolutely true.
6	MR. SHER: He's just asking you	6	Q. Okay.
7	about 1 to 9.	7	A. Salary plus bonus at the end of
8	THE WITNESS: Oh, okay.	8	each year, that's about right.
9	A. Yes, it was a lease.	9	Q. And would it be fair to say
10	BY MR. RATNER:	10	that that you reported that income on your
11	Q. Okay. And in order to become	11	federal income tax return?
12	her guarantor, you had to fill out an	12	A. I don't know what was the
13	application also, right?	13	arrangements. The income per month is always
14	A. Yes.	14	calculated based on a guaranteed salary
15	MR. RATNER: And let's look at	15	plus an unguaranteed year-end performance
16	Exhibit 21, which, Mr. Sher, is page 25.	16	bonus, which could be more or less than a
17	(Exhibit 21, Application to	17	particular person's compensation. That's the
18	become guarantor, marked for identification.)	18	industry practice in the financial services
19	BY MR. RATNER:	19	industry.
20	Q. And page 25, is that the	20	Q. Okay. Well, let's look at
21	application you filled out in order to become	21	Exhibit 22 now, which is page 27.
22	the guarantor for the apartment?	22	(Exhibit 22, Document Bates
23	A. Yes.	23	numbered 27, marked for identification.)
24	Q. And one of the things they	24	A. Yes.
25	asked you in order to induce you to become	25	BY MR. RATNER:
	· ·		
	Page 159		Page 161
1	Page 159	1	Page 161 O And that's something from your
1 2	guarantor of the apartment is what your	1 2	Q. And that's something from your
2	guarantor of the apartment is what your monthly gross income was, right?	2	Q. And that's something from your accountants, Most & Company?
2 3	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form.	2	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes.
2 3 4	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER:	2 3 4	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in
2 3 4 5	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the	2 3 4 5	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income
2 3 4 5 6	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that	2 3 4 5 6	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate?
2 3 4 5 6 7	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question.	2 3 4 5 6 7	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes.
2 3 4 5 6 7 8	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand	2 3 4 5 6 7 8	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on
2 3 4 5 6 7 8	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column	2 3 4 5 6 7 8 9	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax
2 3 4 5 6 7 8 9	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes.	2 3 4 5 6 7 8 9	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right?
2 3 4 5 6 7 8 9 10	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box.	2 3 4 5 6 7 8 9	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes.
2 3 4 5 6 7 8 9 10 11	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right?	2 3 4 5 6 7 8 9 10	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on
2 3 4 5 6 7 8 9 10	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes.	2 3 4 5 6 7 8 9 10 11	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much?
2 3 4 5 6 7 8 9 10 11 12 13 14	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes. Q. And it says, "Present employer,	2 3 4 5 6 7 8 9 10 11 12 13	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much? A. I don't quite recall.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes. Q. And it says, "Present employer, New York Global Group"?	2 3 4 5 6 7 8 9 10 11 12 13	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much? A. I don't quite recall. Q. If I told you it was \$3,365 a
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes. Q. And it says, "Present employer, New York Global Group"? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much? A. I don't quite recall.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes. Q. And it says, "Present employer, New York Global Group"? A. Yes. Q. And position is CEO	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much? A. I don't quite recall. Q. If I told you it was \$3,365 a month, would that refresh your recollection? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes. Q. And it says, "Present employer, New York Global Group"? A. Yes. Q. And position is CEO A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much? A. I don't quite recall. Q. If I told you it was \$3,365 a month, would that refresh your recollection? A. Yes. Q. And you paid a part of that
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes. Q. And it says, "Present employer, New York Global Group"? A. Yes. Q. And position is CEO A. Yes. Q right?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much? A. I don't quite recall. Q. If I told you it was \$3,365 a month, would that refresh your recollection? A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	guarantor of the apartment is what your monthly gross income was, right? MR. SHER: Objection to form. BY MR. RATNER: Q. Well, if you look on the left-hand column I'll withdraw that question. If you look at the left-hand column A. Yes. Q go down to the third box. It asks your work, right? A. Yes. Q. And it says, "Present employer, New York Global Group"? A. Yes. Q. And position is CEO A. Yes. Q right? A. Uh-huh. Q. The date you began this job, 2002, right? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. And that's something from your accountants, Most & Company? A. From a CPA firm, yes. Q. Yeah. And they say that in 2012 you reported federal income tax income of 1.7 million, right? Is that accurate? A. Gross fees of the LLC, yes. Q. Okay. It said, "As reported on Mr. Wey's 2012 Federal Individual Income Tax Return," right? A. Yes. Q. Okay. Now, the monthly rent on this apartment was how much? A. I don't quite recall. Q. If I told you it was \$3,365 a month, would that refresh your recollection? A. Yes. Q. And you paid a part of that rent, right? A. Yes. Q. How much did you pay each month?
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41 (Pages 158 to 161)

	Page 194		Page 196
1	apartment, that's about right.	1	A. I don't remember.
2	Q. Did you ever tell Chemme that	2	Q. Was this was the videotape
3	you made \$30 million a year?	3	of Ms. Bouveng and Mr. Chauvet kissing
4	A. I don't make \$30 million a	4	something you found on the internet or
5	year.	5	someplace else?
6	Q. I didn't ask you that. I asked	6	A. I don't remember.
7	you if you ever told her that you make \$30	7	Q. Did you see a videotape of Mr.
8	million a year.	8	Chauvet and Ms. Bouveng kissing in February
9	A. I don't remember I did. If I	9	2014?
10	did, it was misspoken.	10	A. I don't remember.
11	Q. Did you ever see any videotape	11	Q. Do you have in your possession,
12	or other recordings of Ms. Bouveng and	12	either at home or on a computer someplace or
13	Mr. James Chauvet?	13	at work, the videotape you saw of Mr. Chauvet
14	A. Yes.	14	and Ms. Bouveng kissing?
15	Q. How many videotapes or other	15	A. I have not looked.
16	recordings did you see of Ms. Bouveng and	16	Q. That's not the question. The
17	James Chauvet?	17	question is, do you have it?
18		18	A. I don't know.
		19	
19	Q. Was it more than one?		
20	A. Yes.	20	A. I will look into it.
21	Q. Was it more than two?	21	Q. At any time before April 22,
22	A. Yes.	22	2014, did you see a videotape or other
23	Q. Was it more than five?	23	recording of Ms. Bouveng and Mr. Chauvet
24	A. I don't remember.	24	hugging?
25	Q. Was it more than ten?	25	A. I probably did. I don't
	Page 195		Page 197
1	A. I don't remember.	1	remember.
2	Q. When for the first time did you	2	Q. Where did the video
3	see a videotape or other recording of	3	withdrawn.
4	Ms. Bouveng and James Chauvet?	4	Where did the videotape or
5	A. I don't remember.	5	other recording show that they were hugging?
6	Q. Would it at any time before	6	Was it inside, outside, in a building, on the
7	April 22nd, did you see a video a	7	street or someplace else?
8	videotape or other recording of Hanna Bouveng	8	A. I don't remember.
9	and James Chauvet?	9	Q. Did you see a videotape of them
10	A. I believe I saw something on	10	hugging before April 22, 2014?
11	the Instagram or Facebook or some social	11	A. I don't remember.
12	media website before, before the termination.	12	Q. Did you did you ever see a
13	Q. At any time before April 22,	13	videotape or other recording of Mr. Chauvet
14	2014, did you see a recording of Ms. Bouveng	14	and Ms. Bouveng having intimate relations?
15	and Mr. Chauvet in the apartment building	15	A. Yes.
16	where Ms where Ms. Bouveng rented an	16	Q. When did you see that?
17	apartment?	17	A. I don't remember.
18	A. No.	18	Q. Was were they having
	Q. Did you ever see any recordings	19	intimate relations in an apartment or
19	or videotapes of Ms. Bouveng and Mr. Chauvet	20	or in a dwelling, in a lobby, on the street?
19			Where were they having these intimate
19 20	kissing?	2.1	
19 20 21	kissing? A. I probably did.	21 22	
19 20 21 22	A. I probably did.	22	relations?
19 20 21 22 23	A. I probably did.Q. When for the first time did you	22 23	relations? A. It was inside a building. I
19 20 21 22	A. I probably did.	22	relations?

50 (Pages 194 to 197)

1		Page 330		Page 332
2 MR. RATNER: 1 can represent to you that the only thing that's been redacted from that was communication between Ms. Bouveng and us. Nothing involving Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing involving Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing involving Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communication between Ms. Bouveng and us. Nothing that's been redacted from that was communications with Mr. Wey and anyone or anyone that had nothing to do with anyone or anyone that had nothing to do with anyone or anyone that had nothing to do with anyone or anyone that had nothing to do with anyone or anyone that had nothing to do with anyone or anyone that had nothing to do with anyone or anyone that had nothing to do with anyone or anyone that had nothing to with anyone or anyone that h	1	Q. Is it you do, you don't, or	1	log. We ask you to produce one.
3	2	or you don't know?	2	
4 Q. Well, I want those videos, too. A. I will look for them, and if 6 they are available, they will be given to 7 you. 8 MR. RATNER: Off the record a 9 second. 10 THE VIDEOGRAPHER: The time is 11 now 6700 p.m. Going off the record. 12 (Whereupon, a brief recess is 13 taken.) 14 THE VIDEOGRAPHER: The time is 15 now 5:08. We're going back on the record. 16 MR. RATNER: 6:08. 17 THE VIDEOGRAPHER: Sorry. 18 6:08. 18 A. I will DEOGRAPHER: Sorry. 19 BY MR. RATNER: 20 Q. Mr. Wey, I want to show you 21 whar's marked as Exhibit 33. 22 (Exhibit 33., April 24th e-mail 23 between Benjamin Wey to Hanna Bouveng, marked for identification.) 24 D. It's an e-mail dated April 24th 25 G. Okay. And you ask her to take 26 down the Linkedfla reference, right? 37 A. Yes. 4 A. Yes. 5 Q. Okay. And you ask her to take 4 Own the Linkedfla reference, right? 4 A. Yes. 5 Q. Okay. And eventually she did that, 9 right? 7 A. Yes. 8 Q. And eventually she did that, 9 right? 10 A. A few days later. 11 Q. Okay. You didn't ask her 12 anyplace in this e-mail. 13 (Ekhibit 32, Document Bates numbered 960 through 970, marked for identification.) 14 A. Not in this e-mail. 15 (Ekhibit 32, Document Bates numbered 960 through 970, marked for identification.) 16 BY MR. RATNER: 17 O. Okay. Now, I'd like to show you wharf's been marked as Exhibit 32. which consists of pages marked 960 to 96 – to 970. 18 O. Okay. And then the next page is a picture on top of Ms. Bouveng with someone who you can't identify; is that true? 19 Q. Okay. Now, I'd like to show you wharf's been marked as Exhibit 32, which consists of pages marked 960 to 96 – to 970. 20 Do you see that? 21 D. Okay. And below that is a 22 Do you see that? 23 Do you see that? 24 A. Yes. 25 Do you see that? 26 Do you see that? 27 A. Yes. 38 Q. Okay. And then the next page is a picture on top of Ms. Bouveng with someone who you can't identify; is that true? 28 O. Okay. And below that is a 39 D. Okay. And below that is a 39 D. Okay. And below that is a 39 D. Okay. And below that is a	3	A. I don't know.	3	
5 A. I will look for them, and if 6 they are available, they will be given to 7 you. 8 MR. RATNER: Off the record a 9 second. 10 THE VIDEOGRAPHER: The time is 11 now 6:00 p.m. Going off the record. 12 (Whereupon, a brief recess is 13 taken.) 14 THE VIDEOGRAPHER: The time is 15 now 5:08. We're going back on the record. 16 MR. RATNER: 6:08. 17 THE VIDEOGRAPHER: Sorry. 18 6:08. 19 BY MR. RATNER: 6:09. 17 THE VIDEOGRAPHER: Sorry. 18 6:08. 19 BY MR. RATNER: 509. 10 Q. Mr. Wey, I want to show you 21 what's marked as Exhibit 33. 22 (Exhibit 33. April 24th e-mail 23 between Benjamin Wey to Hanna Bouveng, marked for identification.) 24 D. Us's an e-mail dated April 24th 25 From you to Hanna with a copy to Chemme. Do 3 you see that? 26 Q. And eventually she did that, 27 right? 28 Q. And eventually she did that, 29 right? 30 Q. Okay. You didn't ask her 31 anyplace in this e-mail. 31 (Ekhibit 32, Document Bates on identification.) 32 Pages 331 33 Page 334 34 A. Not in this e-mail. 34 A. Not in this e-mail. 35 (Ekhibit 32, Document Bates on identification.) 36 Q. Okay. Now, I'd like to show you what's been marked 960 to 96 – to 970. 36 Q. Okay. And below that is a 37 Page 333 Provested for identification.) 38 PMR. RATNER: 39 Page 331 40 Q. It's an e-mail dated April 24th 41 From you to Hanna with a copy to Chemme. Do 42 G. Okay. And you ask her to take 43 down the Linkedla reference, right? 44 A. Yes. 45 Q. Okay. You didn't ask her 46 anyone outside - between Mr. Wey and anyone or anyone that had nothing to dowith und anyone or anyone that had nothing to dowith under anyone or anyone that pan anyone or anyone that p	4	Q. Well, I want those videos, too.	4	
they are available, they will be given to you. MR. RATNER: Off the record a second. THE VIDEOGRAPHER: The time is now 6:00 p.m. Going off the record. (Whereupon, a brief recess is taken.) THE VIDEOGRAPHER: The time is now 5:08. We're going back on the record. MR. RATNER: 6:08. THE VIDEOGRAPHER: The time is now 5:08. We're going back on the record. MR. RATNER: 6:08. MR. RATNER: O. So I'd like you to look at page 963 and there's a picture on the top of page 963 of of Hanna and Mr. Chauvet; is that true? A. I have no idea. Q. Well, is that Ms. Bouveng's photograph there? A. Yes. Q. Okay. And if you turn back to page 962, if you look at the left-hand side of the exhibit, there's a picture of you, right? A. Yes. Q. Okay. And if you turn back to page 962, if you look at the left-hand side of the exhibit, there's a picture of you, right? A. Yes. Q. And next to you, it says and it's an investigative reporter. You call Page 331 Q. It's an e-mail dated April 24th from you to Hanna with a copy to Chemme. Do you see that? A. Yes. Q. Okay. And you ask her to take down the LinkedIn reference, right? A. Yes. Q. And eventually she did that, right? A. Yes. Q. And eventually she did that, right? A. A few days later. Q. Okay. You didn't ask her anylplace in this e-mail. (Exhibit 32, Document Bates numbered 960 through 970, marked for identification.) BY MR. RATNER: Q. Okay. Now, I'd like to show you what's been marked as Exhibit 32, which consists of pages marked 960 to 96 - to 970. Do you see that? A. I can only speculate it was Mr. Chauvet. Q. Okay. And below that is a	5		5	Ms. Bouveng and us. Nothing involving
A	6	they are available, they will be given to		= = = =
8 MR.RATNER: Off the record a second. 10 THE VIDEOGRAPHER: The time is now 6:00 p.m. Going off the record. 11 (Whereupon, a brief recess is 12 (Whereupon, a brief re	7		7	
9 second. 10 THE VIDEOGRAPHER: The time is now 6:00 p.m. Going off the record. 11 now 6:00 p.m. Going off the record. 12 (Whereupon, a brief recess is 12 yes and there's a picture on the top of page 13 taken.) 14 THE VIDEOGRAPHER: The time is now 5:08. We're going back on the record. 15 MR. RATNER: 6:08. 16 MR. RATNER: 6:08. 17 THE VIDEOGRAPHER: Sorry. 17 THE VIDEOGRAPHER: Sorry. 17 THE VIDEOGRAPHER: Sorry. 18 6:08. 18 A. Yes. 20 Q. Mr. Wey, I want to show you 20 what's marked as Exhibit 33. 21 of the time of the teft-hand side of the exhibit, there's a picture of two turn back to page 962, if you look at the left-hand side of the exhibit, there's a picture of you, right? 18 A. Yes. 20 Q. Mr. Wey, I want to show you 20 what's marked as Exhibit 33. 21 of the exhibit, there's a picture of you, right? 22 (Exhibit 33, April 24th e-mail 22 of the exhibit, there's a picture of you, right? 23 between Benjamin Wey to Hanna Bouveng, marked for identification.) 24 Page 331 25 Page 331 26 Q. It's an e-mail dated April 24th from you to Hanna with a copy to Chemme. Do you see that? 27 A. Yes. 20 Q. And next to you, it says and it's an investigative reporter. You call 28 Page 331 29 Q. Kay. And you ask her to take down the LinkedIn reference, right? 4 A. Yes. 20 Q. Mr. Wes. 30 Q. "We are focused on Bouveng's affiliation with drug dealers and her contacts and these very troubling photos discovered," right? 30 Q. Okay. You didn't ask her 21 Q. Okay. And then the next page is a picture of opton Mrs. Bouveng with 22 you what's been marked as Exhibit 32, which 22 Consists of pages marked 960 to 96 - to 970. 20 Cokay. And below that is a Mr. Chauvet. 21 Co. Do you see that?	8	MR. RATNER: Off the record a	8	
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12 (Whereupon, a brief recess is 1 12 963, and there's a picture on the top of page 963 of - of Hanna and Mr. Chauvet; is that true? 15 now 5:08. We're going back on the record. 15 MR. RATNER: 6:08. 16 Q. Well, is that Ms. Bouveng's photograph there? A. I have no idea. Q. Well, is that Ms. Bouveng's photograph there? A. Yes. Q. Okay. And if you turn back to page 962, if you look at the left-hand side of the exhibit, there's a picture of you, right? A. Yes. Q. And next to you, it says - and it's an investigative reporter. You call Page 331 Page 333 You see that? A. Yes. Q. And next to you, it says - and it's an investigative reporter. You call Page 333 You see that? A. Yes. Q. And next to you, it says - and it's an investigative reporter. You call Page 333 You see that? A. Yes. Q. And this is part of some Facebook messages that you sent to Nina Chelidze? A. Yes. Q. And this is part of some Facebook messages that you sent to Nina Chelidze? A. Yes. Q. Okay. And then the next page is a picture on top of Ms. Bouveng with someone, right? A. Yes. Q. Okay. And then the next page is a picture on top of Ms. Bouveng with consists of pages marked 960 top 96 - to 970. 20 Okay. And below that is a	11	now 6:00 p.m. Going off the record.	11	Q. So I'd like you to look at page
13	12	(Whereupon, a brief recess is	12	
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discovered," right? A. Yes. Q. And eventually she did that, pright? A. Yes. Q. And eventually she did that, pright? A. Yes. Q. And this is part of some Facebook messages that you sent to Nina Chelidze? Lo Okay. You didn't ask her property, true? A. I cannot confirm who I sent it consists of pages marked 960 to 96 to 970. Do you see that? discovered," right? A. Yes. Q. And this is part of some Facebook messages that you sent to Nina Chelidze? A. I cannot confirm who I sent it A. Yes. Q. Okay. But it's something you sent to someone, right? A. Yes. Q. Okay. And then the next page is a picture on top of Ms. Bouveng with someone who you can't identify; is that true? A. I can only speculate it was Mr. Chauvet. Q. Okay. And below that is a	4	A. Yes.	4	affiliation with drug dealers and her
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8 Q. And eventually she did that, 9 right? 9 Pacebook messages that you sent to Nina 10 A. A few days later. 11 Q. Okay. You didn't ask her 12 anyplace in this e-mail to return company 13 property, true? 14 A. Not in this e-mail. 15 (Exhibit 32, Document Bates 16 numbered 960 through 970, marked for 17 identification.) 18 BY MR. RATNER: 19 Q. Okay. Now, I'd like to show 20 you what's been marked as Exhibit 32, which 21 consists of pages marked 960 to 96 to 970. 22 Do you see that? 8 Q. And this is part of some 9 Facebook messages that you sent to Nina 10 Chelidze? 11 A. I cannot confirm who I sent it 12 to. 13 Q. Okay. But it's something you 14 sent to someone, right? 15 A. Yes. 16 Q. Okay. And then the next page 17 is a picture on top of Ms. Bouveng with 18 someone who you can't identify; is that true? 19 Q. Okay. Now, I'd like to show 20 You what's been marked as Exhibit 32, which 21 Consists of pages marked 960 to 96 to 970. 22 Do you see that? 8 Q. And this is part of some 9 Facebook messages that you sent to Nina 10 Chelidze? 11 A. I cannot confirm who I sent it 12 to. 13 Q. Okay. But it's something you 14 sent to someone, right? 15 A. Yes. 16 Q. Okay. And then the next page 17 is a picture on top of Ms. Bouveng with 18 someone who you can't identify; is that true? 19 A. I can only speculate it was 20 A. I can only speculate it was 21 Chelidze? 22 Do kay. And below that is a	6	down the LinkedIn reference, right?	6	discovered," right?
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Do you see that? 22 Q. Okay. And below that is a	20	•		
		= =		
MR. SHER: I just want to note 23 picture of a woman inserting a black dildo in				= •
<u> </u>				
for the record that Exhibit 32 appears to be 24 her vagina. What's that all about?				
25 redacted, and we haven't received a redaction 25 MR. SHER: Objection to form.	25	redacted, and we haven't received a redaction	25	MR. SHER: Objection to form.

r	1		
	Page 334		Page 336
1	A. This picture is among the many	1	A. Researchers.
2	pictures searched online associated with	2	Q. These Chinese researchers?
3	Hanna Bouveng and James Chauvet.	3	A. In Asia.
4	BY MR. RATNER:	4	Q. And you said that
5	Q. Was this picture from Hanna	5	they when they did research looking into
6	Bouveng's Instagram account?	6	Hanna Bouveng and James Chauvet, this is a
7	A. I don't I don't think so.	7	picture that appeared; is that what you're
8	Q. Was this picture from James	8	telling us?
9	Chauvet's Instagram account?	9	A. They did global searches. Many
10	A. I don't know.	10	photos came up.
11	Q. Was it from James Chauvet's	11	Q. And this is one of the photos
12	Facebook page?	12	that came up when you looked up Hanna Bouveng
13	A. I don't know.	13	on the internet or James Chauvet on the
14	Q. Well, how other than the	14	internet or both of them on the internet,
15		15	right?
16	fact that it's a picture of a black penis in	16	_
	a white vagina, how is it in any way	17	MR. SHER: Objection. Foundation.
17	associated with Hanna Bouveng and James	18	BY MR. RATNER:
18	Chauvet?	19	
19	A. Because this particular sex		Q. Is that what you're telling us?
20	toy, if I could call it, was found in Hanna	20	A. My understanding is those
21	Bouveng's apartment.	21	names, yes.
22	Q. Who found it in Hanna Bouveng's	22	Q. So why in heaven's name would
23	apartment?	23	you send this to someone?
24	A. I found it.	24	A. Please repeat the question.
25	Q. When?	25	Q. Why in heaven's name would you
	Page 335		Page 337
1	A. After she left the apartment.	1	send this to someone?
2	Q. Did that somehow offend you	2	A. Well, to be frank with you, in
3	that she had a sex toy?	3	hindsight, I probably shouldn't have done it.
4	A. Not at all.	4	Q. No. But why did you do it?
5	Q. And did you find this picture	5	What the hell were you thinking? Withdrawn.
6	of a white woman and a black dildo in her	6	What in heaven's name did you
7	apartment?	7	think when you sent this?
8	A. No.	8	A. I was so upset, I tell, you. I
9	Q. So you had to go find a picture	9	felt a strong sense of betrayal. Every day
10	of a white woman with a black dildo and	10	she came to my office. She said, Ben, I'm so
11	and send it to someone, right?	11	grateful to you. You're my mentor. You
12	A. Not at all. Not true.	12	changed my life. Her father says the same
13	Q. Well, how did you get that	13	thing to me.
14	picture?	14	And I I felt so angry, upset
15	•	15	after I had to terminate her. I felt her
16	A. The pictures were searched	16	life was ruined by James Chauvet, and Mr.
17	according to online searches in names associated with Hanna Bouveng and James	17	Chauvet's criminal record certainly
	Č ,	18	contributed to that particular anger.
18	Chauvet, party lives, and this picture	18	1 0
19	appears to be some some form of a nature		And in hindsight, I I should
20	involving that dildo found in her apartment.	20	not have sent it to anybody. I don't care
21	I cannot confirm one way or the other.	21	who that is. That was not appropriate.
22	Q. Does that purport to be a	22	Q. I mean, you you were
23	picture of Hanna Bouveng's vagina?	23	like really angry, like, that she betrayed
24	A. I have no idea.	24	you at the end of April 2014, right?
25	Q. Who found this picture?	25	A. I discovered numerous lies

85 (Pages 334 to 337)

1 2 3 4			Page 340
3	she she told. I thought it was not	1	a.m.
	necessary, and I just felt like, you know, I	2	Q. Okay. In any event okay. I
	was her mentor. And she told me that every	3	got the wrong one. That's fine. All right.
	single day, Ben, how grateful I am to you.	4	April 22nd.
5	You give me such a beautiful life.	5	And that's Hanna and
6	Her father said the same thing	6	Mr. Chauvet walking into the building, right?
7	to me. Her aunt said the same thing to me.	7	A. Yes. In early morning, drunk,
8	Every day. I felt almost responsible for her	8	yes.
9	better life as a mentor, as a dear friend.	9	Q. Okay. And you could tell that
10	Q. So that you felt that because	10	they were drunk from that video, right?
11	of that you had to send a pornographic	11	A. I could tell, yes.
12	picture to a friend, Nina Chelidze, right?	12	Q. All right. If you look at the
13	A. This picture came up along with	13	third paragraph, you say, "Hanna, I could
14	many other searches.	14	never understand how a talented young lady
15	Q. So you felt that you had to	15	like Hanna would date a man with a criminal
16	send a pornographic picture to Nina Chelidze,	16	history and works as a nightclub promoter."
17	right?	17	You said that?
18	A. No. I had no idea who I sent	18	A. Yes.
19	it to, but it appears that I sent it to	19	Q. And then back on the fourth
20	somebody. Whoever that was on the receiving	20	sentence, you say, "Wake up, Hanna. Was it
21	end of it was not an appropriate thing to do.	21	better sex or better alcohol," right?
22	I I regret.	22	A. Yes.
23	_	23	Q. "Was it better sex or better
24	Q. Okay.A. That's the bottom line.	24	alcohol that kept you blind?"
25		25	* *
<u> </u>		25	Who are you comparing the
1	Page 339	_	Page 341
1	full months after April 22nd. You sent it on	1	better sex to?
2	July 22, 2014. I mean, wasn't your sense of anger someone lessened by then?	2	
3		٦	Was it better sex that James
	•	3	Chauvet gave her than you gave her or
4	A. I have no idea of the date. I	4	Chauvet gave her than you gave her or something else?
4 5	A. I have no idea of the date. I don't seem to find this date or one way or	4 5	Chauvet gave her than you gave her or something else? A. This most likely was written in
4 5 6	A. I have no idea of the date. I don't seem to find this date or one way or the other.	4 5 6	Chauvet gave her than you gave her or something else? A. This most likely was written in the middle of anger. If I could change the
4 5 6 7	A. I have no idea of the date. I don't seem to find this date or one way or the other. MR. RATNER: Exhibit Exhibit	4 5 6 7	Chauvet gave her than you gave her or something else? A. This most likely was written in the middle of anger. If I could change the word, I'd change the word to good instead of
4 5 6 7 8	A. I have no idea of the date. I don't seem to find this date or one way or the other. MR. RATNER: Exhibit Exhibit 30. Thank you.	4 5 6 7 8	Chauvet gave her than you gave her or something else? A. This most likely was written in the middle of anger. If I could change the word, I'd change the word to good instead of better. That would be more appropriate in
4 5 6 7 8 9	A. I have no idea of the date. I don't seem to find this date or one way or the other. MR. RATNER: Exhibit Exhibit 30. Thank you. (Exhibit 30, April 29, 2014	4 5 6 7 8 9	Chauvet gave her than you gave her or something else? A. This most likely was written in the middle of anger. If I could change the word, I'd change the word to good instead of better. That would be more appropriate in the English language, and my native language
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